

**Sheryl (Sherry) L. Herauf**  
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**PACIFIC  TELESIS.**  
Group - Washington

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**OCT 20 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**October 20, 1993**

**William F. Caton**  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Mr. Caton:

Re: *RM 8334 - American Telephone and Telegraph Company Petition for the  
Establishment of Additional Standards to Govern Study Area Boundary Changes in  
Connection with the Transfer of Service Territories Between or Among Local Exchange  
Carriers*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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OCT 20 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
AMERICAN TELEPHONE AND )  
TELEGRAPH COMPANY )  
 )  
Petition for the Establishment )  
of Additional Standards to Govern )  
Study Area Boundary Changes in )  
Connection with the Transfer of )  
Service Territories Between or )  
Among Local Exchange Carriers )  
 )

RM-8334

COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pursuant to the Public Notice dated September 20, 1993,<sup>1</sup> Pacific Bell and Nevada Bell (the "Pacific Companies") hereby comment on the Petition For Rulemaking filed by AT&T to establish additional standards for evaluating study area waiver requests.

AT&T's Petition for Rulemaking sets forth specific detailed information that would be required to be furnished to the Commission as part of a study area waiver. AT&T filed its request on September 3, 1993. On September 7, 1993 the Commission issued a Public Notice listing information that it requests parties file in connection with study area waiver

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<sup>1</sup> American Telephone and Telegraph Company Files Rulemaking Petition to Establish Additional Standards for Evaluating Study Area Waiver Requests, RM 8334, Public Notice, DA-93-1128, released September 20, 1993.

requests in order to forestall delays in evaluating the waiver requests.

The information in AT&T's Petition and the Commission's Public Notice is similar. The major difference is that AT&T seeks mandatory submission of the information. Waivers by their nature deal with individual conditions. Consequently, a flexible approach as set out in the Commission's Public Notice is reasonable. There is no compelling reason at this time to codify rules to set out detailed information that must accompany every study area waiver.

Study area waiver requests are directly related to levels of subsidy available through the Universal Service Fund. As such, study area waivers are one of the Commission's support/subsidy mechanisms. The Pacific Companies believe, in light of the competitive environment and the current regulatory activity, the Commission should not attempt piecemeal changes in rules that affect its public policy goals. Instead, the Commission should evaluate all public policy elements in one comprehensive proceeding. At that time, the Commission can evaluate if there is any need to specify mandatory information to include in study waiver requests.

For the foregoing reasons, the Pacific Companies respectfully request that the Commission dismiss AT&T's Petition for Rulemaking.

Respectfully submitted,

PACIFIC BELL  
NEVADA BELL

  
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Their Attorneys

Date: October 20, 1993